

Jason M. Tangeman, WSB # 6-3082
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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

RIA R SQUARED, INC., a Delaware corporation,)	
)	
)	
Plaintiff,)	Civil Action No. 21-cv-00125-SWS
)	
vs.)	HON. SCOTT W. SKAVDAHL
)	
PAUL D. MCCOWN and MCCOWN ENTERPRISES, LLC,)	
)	
Defendants.)	

OBJECTION AND RESPONSE TO MOTION FOR ENTRY OF JUDGMENT (DOC. 73)

Defendants Paul D. McCown (“Mr. McCown”) and McCown Enterprises, LLC (“McCown Enterprises”), by and through their attorneys, Nicholas & Tangeman, LLC, hereby respectfully object to and oppose Plaintiff’s FRCP 54 (b) Motion for Entry of Judgment (Doc. 73). Reason in support of this Opposition and Response is that Rule 54 (b) is only applicable to claims and parties. The only remaining issue for the Court is the question of punitive damages. Punitive damages are neither a claim nor a party. *Errington v. Zollessi*, 9 P.3d 966, 969 (Wyo. 2000) Punitive damages are a remedy. Plaintiff cannot bifurcate remedies pursuant to Rule 54 (b).

WHEREFORE Defendants request the Court deny the Motion for Entry of Judgment.

DATED this 25th day of April, 2022.

Respectfully submitted,

/s/ Jason M. Tangeman

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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to all attorneys of record in this matter registered with the ECF system.

/s/ Jason M. Tangeman